

July 15, 2019

VIA ECFS

Ms. Marlene Dortch Secretary Federal Communications Commission 445 12th Street, SW Washington, D.C. 20554

Re: Notice of Oral *Ex Parte* - Assessment and Collection of Regulatory Fees for Fiscal Year 2019, MD Docket No. 19-105

Dear Ms. Dortch:

On July 11th, 2019, representatives of the Satellite Industry Association ("SIA") ¹ met with members of the International Bureau and Office of the Managing Director to discuss the above referenced proceeding.

SIA requested clarification from the Commission staff regarding proposed increases in the fee schedule for Fiscal Year 2019 for geostationary space stations, non-geostationary space stations, and earth stations. Specifically, the FCC proposes fee increases for those payment categories of 25%, 26%, and 31%, respectively. SIA expressed the view that these

¹ SIA is a U.S.-based trade association providing representation of the leading satellite operators, service providers, manufacturers, launch services providers, and ground equipment suppliers. Since its creation twenty years ago, SIA has advocated on behalf of the U.S. satellite industry on policy, regulatory, and legislative issues affecting the satellite business. <u>SIA Executive Members include</u>: The Boeing Company; DIRECTV; EchoStar Corporation; Intelsat S.A.; Iridium Communications Inc.; Kratos Defense & Security Solutions; Ligado Networks; Lockheed Martin Corporation; Northrop Grumman Corporation; OneWeb; SES Americom, Inc.; Space Exploration Technologies Corp.; SSL; and ViaSat, Inc. <u>SIA Associate Members include</u>: ABS US Corp.; Artel, LLC; COMSAT Inc.: DigitalGlobe Inc.; DRS Technologies, Inc.; Eutelsat America Corp.; Global Eagle Entertainment; Glowlink Communications Technology, Inc.; Hughes; iDirect Government Technologies; Inmarsat, Inc.; Kymeta Corporation; L-3 Electron Technologies, Inc.; O3b Limited; Panasonic Avionics Corporation; Planet Labs Inc.; TeleCommunication Systems, Inc.; Telesat Canada; TrustComm, Inc.; Ultisat, Inc.; and XTAR, LLC.

increases are substantial and have not been budgeted for by member companies. SIA requested explanation of these proposed fee increases. SIA noted that regardless of the driver of the fee increases, increases of this magnitude are unduly burdensome for satellite operators – some of whom already pay millions annually in regulatory fees. SIA argued that a phase-in of such unusually large fee increases would be in the public interest, consistent with Commission precedent, and would greatly ease budgetary stress on satellite service companies.

Attending on behalf of SIA were: Therese Jones (SIA), Tom Stroup (SIA), Michael Weinhoffer (SIA), Susan Crandall (Intelsat), Joe Godles (Goldberg, Godles, Wiener & Wright LLP for Telesat), Karis Hastings (SatCom Law LLC for SES), and Jodi Goldberg (EchoStar).

Attending on behalf of the FCC were: Brian Murff, Stephen Duall, Deena Shetler, Roland Helvajian, and Paul Blais, and Sally Stone participated in the meeting via telephone.

Respectfully submitted,

SATELLITE INDUSTRY ASSOCIATION

By: /s/ Tom Stroup

Tom Stroup President 1200 18th Street, N.W., Suite 1001 Washington, D.C. 20036 (202) 503-1560

Cc: Sally Stone Brian Murff Stephen Duall Deena Shetler Roland Helvajian Paul Blais